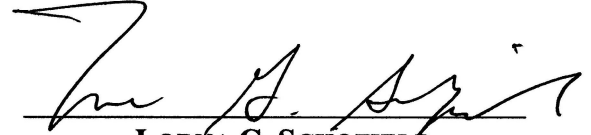


By **March 1, 2025**, Dr. Southard and the Mercy Defendants shall file any motion for summary judgment, not to exceed 8,750 words each. By **April 15, 2025**, Plaintiff may file a consolidated opposition, not to exceed 17,500 words in total. By **April 25, 2025**, Dr. Southard and the Mercy Defendants may file any reply, not to exceed 3,500 words each. The submissions shall otherwise comply with Individual Rule III.B. So Ordered.

Dated: January 29, 2025  
New York, New York

January 28, 2025



**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**

**VIA ECF**

Hon. Lorna G. Schofield  
United States District Court, Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Courtroom 1106  
New York, New York 10007

Re: Timothy Rodgers v. Mercy College et al., Case No. 1:23-cv-7278 (LGS)

Your Honor:

We represent Defendant Dr. Kristine Southard (“Dr. Southard”) in the above-referenced matter and submit this letter jointly with Plaintiff Timothy Rodgers (“Plaintiff”) and Defendants Mercy College, Dr. Jose Herrera, and Timothy Hall (together with Dr. Southard, “Defendants,” and with Dr. Southard and Plaintiff, the “Parties”) in response to the Court’s Order, dated January 24, 2025 (ECF No. 122).

The Parties attended a settlement conference on January 16, 2025 before Magistrate Judge Netburn (*see* ECF No. 113). The Parties engaged in good-faith negotiations but did not resolve any of their remaining claims, which are outlined in the Parties’ stipulation of partial dismissal which was so-ordered on January 15, 2025 (ECF No. 121).

Accordingly, the Parties have conferred and propose the following mutually agreeable briefing schedule for Defendants’ motions for summary judgment.

- Defendants’ motions for summary judgment to be filed before or on April 9, 2025;
- Plaintiff’s Opposition brief(s) to be filed before or on June 13, 2025;
- Defendants’ Reply briefs to be filed before or on July 11, 2025.

We appreciate Your Honor’s consideration of this request and remain available should the Court require additional information.

PADUANO & WEINTRAUB LLP

Hon. Lorna G. Schofield  
January 28, 2025  
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Respectfully submitted,

PADUANO & WEINTRAUB LLP

By: /s/ Tara H. Curtin

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Cc: All Counsel of Record (via ECF)